

**REPLY COMMENTS OF THE
LOS ANGELES DEPARTMENT OF WATER AND POWER
ON THE ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS ON
TYPE AND POINT OF REGULATION ISSUES**

In accordance with Rule 14 of the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC" or "Commission") of the State of California, the Los Angeles Department of Water and Power ("LADWP") hereby files the following Reply Comments submitted in response to the "Administrative Law Judges' Ruling Requesting Comments on Type and Point of Regulation Issues," filed November 19, 2007 , in CPUC Rulemaking R.06-04-009 ("Rulemaking") and California Energy Commission (CEC) Docket # 07-OIIP-1.

I. INTRODUCTION

The LADWP appreciates the opportunity to provide reply comments on issues related to type and point of regulation beyond the first seller. We also recognize that the recommendations the CPUC and CEC adopt and forward to the California Air Resources Board (CARB) are intended to help inform, on behalf of the electricity sector, the CARB's AB 32 rulemaking process that encompasses many other sectors and sources of greenhouse gas (GHG) emissions that may likely be included in a CARB GHG program. The LADWP's participation in this joint CPUC/CEC proceeding reflects our primary goal, which is to work in partnership with the State to achieve real environmental benefits through GHG reductions, to protect customers from unfair cost burdens and rate spikes and to preserve electric system reliability. The LADWP strongly supports AB 32 and California's efforts to develop a comprehensive GHG emission reduction program with reductions beginning in 2012 that encompass all electricity sector emissions, in-state and imported. While we see merit in deferring a

cap-and-trade program, as a secondary compliance tool, to a broader regional and/or federal program, we do not support delaying the implementation of AB 32 overall.

The LADWP does not support a first seller approach that shifts compliance burden away from California retail service providers, falsely relies on higher market clearing prices for wholesale electricity to alter dispatch to cleaner resources, or weakens load-based emission reduction strategies. Direct emission reduction measures, aside from discrete early action measures, should begin in 2012.

In the process of vetting the point of regulation, parties have identified legal and/or technical constraints for each option, whether first seller, load-based or some hybrid of a source-based. The LADWP still continues to view the load-based point of regulation as the least susceptible to legal challenge and most effective for reducing emissions from retail providers to meet the intent of AB 32 to address emissions from all electricity consumed in the state (in-state and imported).

The LADWP has stated in this proceeding that our preference for a California-only program is a load-based approach, despite the fact that we are neutral in terms of impact on our operations since we would be the point of regulation as a retail provider or as a generator and given that we are fully resourced and do not rely on the wholesale market to serve our native load. Our position changes when the discussion broadens to a regional (WECC-wide) or federal program, in which case it is clear that a source-based approach is superior, and problems identified with a California-only approach dissipate.

An emerging alternative that warrants serious consideration is deferral of a California-only cap-and-trade program until there is a regional or federal cap-and-trade

program. This does not preclude California from aggressively continuing with existing electricity sector programs (renewables, energy efficiency, etc.) as load-based emission reduction strategies. In evaluating this option, the CPUC/CEC and the ARB must consider the options for the electricity sector to continue to pursue emission reductions in a “transitional” non-market phase that provides for real, permanent, quantifiable, verifiable, and enforceable emission reductions in the near-term.

A load-based command approach, as currently implemented in California, provides for those reductions in a manner that eliminates many of the legal and technical challenges for a California-only market-based approach identified thus far in this proceeding. The CPUC/CEC and the ARB would also have to consider the risks associated with implementing a California-only market-based approach, for which the LADWP has expressed its concerns about an illiquid market. The potential exercise of market power and repercussions on the electricity and emissions trading markets, and most importantly the consequence of an allowance allocation methodology that creates a punitive wealth transfer that diverts resources away from direct emission reduction efforts are risks that are simply unacceptable. Further discussion about deferral is included below.

II. PRINCIPLES OR OBJECTIVES TO BE CONSIDERED IN EVALUATING DESIGN OPTIONS

A. Reliability of the Electricity Grid is of Utmost Importance

The LADWP, as a retail provider and a balancing authority, believes that reliability of the electric power system should be the first-ranked principle for evaluating design options for the electricity sector. Reliability of the electric power system is

dependent upon two elements, resource adequacy and security. Resource adequacy is the availability of sufficient generation and transmission resources to meet customer's projected energy needs plus reserves for contingencies. Security is the ability of the system to remain in tact after experiencing sudden disturbances, outages or equipment failures. Any GHG emission reduction program must be designed with reliability, as the first and foremost principle, in mind. Other parties' comments recommending the addition of this principle include the following:

- SMUD: "Maintain/Enhance Reliability: Does the approach being considered compromise the efficient and reliable operation of the electric grid? Does the approach provide incentives that will encourage the location of generation outside of California further pressuring transmission capabilities? Does the approach discourage location of generation in load centers?" SMUD at 2.
- SDG&E: "SDG&E would add the safety and reliability of the electric system to the list of objectives (this would be broader than compatibility with MRTU). SDG&E at 4.
- NCPA: "The objective of greenhouse (GHG) reductions must be achieved in the context of providing safe and reliable electric service to California's consumers." NCPA at 2.
- IEP: Ranks Grid Reliability as "very important": "To what extent will the proposed approach support (or alternatively undermine) grid reliability and electricity service?...IEP believes that if this design objective is not realized, as a threshold matter, then the other objectives will, in hindsight, look pale in comparison." IEP at 6.

B. Equity and Fairness

The LADWP recommended in its Opening Comments that the principle of equity and fairness be included in the principles for evaluating the design of a GHG emission reduction program for the electric sector. SCPA also suggested this in their Opening Comments, "Fairness should be included in the list of principles and objectives." SCPA at 10. "It would be unfair to require communities that...face the greatest challenges and

costs in meeting AB 32 goals to simultaneously transfer wealth to other communities that...are less challenged and consequently face lower costs.” SCPPA at 11. SCPPA also included, as part of their Opening Comments the resolution adopted November 14, 2007 by the National Association of Regulatory Utility Commissioners (NARUC) “EL-1 Resolution on Federal Climate Legislation and Cap-and-Trade Design Principles. Besides the MAC’s inclusion of “equity” as a design principle in their recommendations to the ARB, the NARUC also expresses support for this same principle, “Any emissions allowance allocation program should not inappropriately advantage or disadvantage particular regions, local distribution companies...or generators...” SCPPA Attachment A: NARUC Principle #7 at 4.

III. DEFERRAL OF A MARKET-BASED CAP-AND-TRADE SYSTEM

California has been a leader on climate change with the passage of AB 1493 (Pavley) to reduce passenger car greenhouse gas (GHG) emissions by about 30 percent by 2016. Governor Arnold Schwarzenegger's 2005 Executive Order plus Assembly Bill 32 (Núñez-Pavley), along with the passage of SB 1368 (Perata) continue to demonstrate California’s leadership on the issue of climate change. California’s participation in the International Carbon Action Partnership (ICAP) and support of regional efforts like the Western Climate Initiative and Midwestern Greenhouse Gas Reduction Program have helped to build the momentum needed for federal action on the issue. These important efforts illustrate a groundswell of public support for federal action that up until now has been lagging behind.

In considering deferral of a cap-and-trade program, the CPUC/CEC and ARB should evaluate key factors, including 1) broader market and sector participation, 2)

similar or equivalent timeframe for implementation, 3) consistency of federal and state regulatory frameworks, 4) ability to achieve federal level and state level (likely more stringent) emission reduction goals cost-effectively, 5) ease of transition, and 6) avoidance of dual compliance obligations (i.e. same emissions are paid for twice, once under an AB 32 program and second under a federal program). A regional or federal market-based program, if implemented in the same timeframe as AB 32 and in a way that allows California to achieve the reduction goals envisioned in AB 32, provides an approach that eliminates the futile intra-sector debate that has occurred in California.

Parties have differing views on deferral of a cap-and-trade system until there is a regional or federal program, and some of that may be due to the perception that a federal program may not be in place for several years. The fact is that regional and federal GHG efforts are moving more quickly than what might have been anticipated even one year ago. In some respects, the “delay” is nearly undetectable in terms of time, yet the broader approach offers an opportunity for better integration of efforts which translates into a smoother transition, and less opportunity for potential market problems that can happen if and when an emissions trading market is not robust.

In May 2008, the Western Climate Initiative (WCI) subcommittee recommendations on key elements of regional cap-and-trade program will be released, followed in July 2008 with the release of the proposed design of a WCI regional cap-and-trade program. In August 2008, WCI partners will release design recommendations for a regional cap-and-trade program. At the federal level, legislative proposals are advancing the federal GHG dialogue very quickly, such as the Lieberman-Warner Climate Security Act of 2007 (S. 2191) that proposes an implementation start date of

2012, the same start date as proposed in AB 32.

With respect to parties' opening comments on the point of regulation, there is a general recognition that a federal program eliminates many of the challenges that would be faced by a California-only approach. However, there are differences of opinion on what a California-only non market-based program would entail:

- DRA: "DRA also recognizes the benefit of refraining from developing a market-based California system until a comparable Western regional or federal system is in place." DRA at 4. "From the perspective of the electricity sector...a cap-and-trade system is only beneficial if it truly does reduce emissions. If leakage and contract shuffling issues greatly undermine reduction efforts, then a cap-and-trade system would result only in reductions on paper. If this is the case, then a cap and trade program is certainly not important in the near term...it might be beneficial to wait until a regional or national program is in place, and, in the meantime, rely on other strategies to reduce electricity emissions." DRA at 19.
- CAISO: "Our recommendation against adopting a load-based program for regulating the emissions of greenhouse gases associated with electricity consumption in California should not be interpreted as implying that we necessarily favor the immediate implementation of source-based trading in the state. The very likely advent of federal GHG regulation in the next few years means that there are advantages to deferring implementation of a formal trading system in California until the form of federal regulation becomes clear...[Because] California's dependency on imported power raises doubts about the environmental integrity of a California-only GHG trading system, it is difficult to justify the cost of establishing a sophisticated trading system...that might be abandoned quickly in the face of a federal program." CAISO at 9.
- PG&E: "PG&E believes that the key variable to consider in assessing these alternatives is whether a national GHG system is likely to be implemented within the same general time frame as AB 32. PG&E believes the answer is yes, a national GHG system is likely to be in place in the same general time frame as implementation of AB 32, and therefore [in-state only source-based, and programmatic implementation of AB 32 pending adoption of a national program] may be significantly more efficient and effective than any load-based approach..." PG&E at 1-2. "A key integration issue is the transferability of allowances from a state to a federal program. Inability to transfer such allowances may cause significant integration issues and be very costly to complying entities and to LSE's customers." PG&E at 27. PG&E's first and foremost preference is a national source-based, multi-sector cap and trade

approach with a WECC-wide regional source-based approach as a second option.” PG&E at 28.

- SCE: “If California elects to delay the development of a market-based program and implements additional programmatic solutions, it is important that such programmatic solutions do not impose a dual burden on California...such programmatic solutions must apply...equally to all entities in the electricity sector (i.e. IOU, POU, ESP, and CCA).” SCE at 14.
- SDG&E: A deferral of a market-based cap-and-trade to a regional or national system is reasonable given the heightened sensitivity to GHG regionally and nationally. There is now a realistic expectation of such cap-and-trade markets emerging in the near term. SDG&E’s concern is that command and control regulations...could effectively prohibit California from participating in a regional or national market...[To] the extent that GHG reduction activities have been mandated by regulation, they may not get credit in any national market that may be developed, depriving California ratepayers of the value of the efforts that they have funded to generate the GHG emission reductions.” SDG&E at 12-13. “Transitional command and control regulations coupled with flexible compliance mechanisms put in place in anticipation of developing a larger cap-and-trade market in the future could be an efficient way to expand the magnitude of GHG reductions, and relieve California of the leakage, tracking, and electricity market distortions that are inherent problems in a California-only market.” SDG&E at 13.
- GPI: “[Indiscriminant] reliance on the illusion of market forces from the beginning of the program, when markets are neither mature nor functioning competitively, can be a poor policy choice.” GPI at 2. “With California so dependent on imported energy, and the fact that imported energy is the most carbon-intensive on the western grid, only a regional approach to greenhouse gas control can truly avoid abuses practiced on California consumers.” GPI at 8. “Until a regional approach to greenhouse gas regulation is assured, the load-based approach offers California the best chance to minimize the risks of program manipulation that are associated with imported power.” GPI at 10.
- EPUC/CAC: “An argument can be made that California has an opportunity to provide leadership in a regional or federal program if it continues down the road to implementation of AB 32. This leadership could increase the likelihood of broader adoption of California principles, although that broader adoption is certainly not assured. It is not clear...that California cannot bring the same influence to bear in regional or national negotiations.” EPUC/CEC at 25.
- SCPPA: If a federal program were to include such a cap-and-trade feature, it would be helpful for the California program to include tradable allowances so as to fit into a national cap-and-trade program...The CPUC...planned to institute allowance trading in the interest of having a California program that would fit with a subsequent national program...” SCPPA at 35.

- Calpine: “[It] is important to the long-term success of California’s GHG emission reduction efforts that the trading system be designed to anticipate and take into account an expected federal trading system.” Calpine at
- WPTF: “WPTF supports continued development of a GHG cap and trade program for California, but nevertheless urges the state to do so with an ongoing recognition that its system must eventually be compatible with a regional and national system.” WPTF at 1-2. “...a comprehensive federal approach will avoid constitutional challenges that otherwise could confront a state or regional approach.” WPTF at 6. “The potential for emission leakage decreases substantially under a regional (i.e. WECC-wide) GHG trading system, and gain under a federal system.” WPTF at 10.

Another consideration that CPUC/CEC and ARB must evaluate is the integration of AB 32 emission reduction goals with federal regulatory efforts (i.e. non-legislative GHG reductions). Aside from the legislative proposals that have been debated extensively in recent months, the U.S. Environmental Protection Agency is expected to embark on several rulemakings to address GHG emissions in 2008 that would have a direct impact on stationary sources (including electricity generators), including the following: 1) proposed rule under Clean Air Act (CAA) Sections 202 and 211 for motor vehicles and fuels – “Endangerment” Rulemaking, 2) Advance Notice of Rulemaking on stationary source controls under CAA Section 165 (Prevention of Significant Deterioration (PSD)/Best Available Control Technology (BACT), 3) final action on California’s petition for a waiver under CAA Section 209, and 4) proposed rules under CAA Section 111 for utility boilers (new and existing) and possibly for other source categories.

IV. CONCLUSION

The LADWP strongly supports AB 32 and the State's efforts to reduce emissions in the near-term through direct emission reduction load-based programs. The LADWP does not support a first seller approach that would likely weaken support for load-based programs and may create an emissions trading program that results in an unfair wealth transfer away from direct emission reduction efforts. The LADWP believes the intent of AB 32 is to reduce emissions. The State should remain focused on that goal and reject efforts to shift compliance obligations away from retail providers and create opportunities for inappropriate financial gain. Should the State opt to defer a cap-and-trade market-based program until there is a source-based regional or federal program, the LADWP believes such action does not preclude the State from embarking on an emission reduction program starting in 2012 that is specifically designed for California that meets the intent of AB 32 to address both in-state and imported electricity.

The LADWP appreciates the opportunity to provide these reply comments to the CPUC and CEC for your consideration.

Dated: December 17, 2007 Respectfully submitted,

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I hereby certify that I have this day served a copy of the attached:

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